

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: STEWARD HEALTH CARE SYSTEM LLC, <i>et al.</i>, Debtors.¹	§ § § § § § § § §	Chapter 11 Case No. 24-90213 (CML) (Jointly Administered) Re: Docket No. 1712
---	--	--

**NOTICE OF FILING OF REVISED
PROPOSED ORDER (I) AUTHORIZING
REJECTION OF MASTER LEASE II AGREEMENTS
EFFECTIVE AS OF THE REJECTION DATE IN CONNECTION
WITH PLANNED TRANSITION AND SALE OF MASSACHUSETTS
HOSPITALS TO NEW OPERATORS, AND (II) GRANTING RELATED RELIEF**

PLEASE TAKE NOTICE that, on July 26, 2024, Steward Health Care System LLC and its debtor affiliates, as debtors and debtors in possession in the above-captioned chapter 11 cases (the **“Debtors”**), filed the *Emergency Motion of Debtors for Order (I) Authorizing Rejection of Master Lease II Agreements Effective as of the Rejection Date in Connection With Planned Transition and Sale of Massachusetts Hospitals to New Operators, and (II) Granting Related Relief* (Docket No. 1712) (the **“Motion”**),² with a proposed order granting the relief requested in the Motion attached thereto as Exhibit A (the **“Proposed Order”**).

PLEASE TAKE FURTHER NOTICE that, the Debtors hereby file the revised proposed *Order (I) Authorizing Rejection of Master Lease II Agreements Effective as of the Rejection Date in Connection With Planned Transition and Sale of Massachusetts Hospitals to New*

¹ A complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://restructuring.ra.kroll.com/Steward>. The Debtors’ service address for these chapter 11 cases is 1900 N. Pearl Street, Suite 2400, Dallas, Texas 75201.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

Operators, and (II) Granting Related Relief, attached hereto as **Exhibit A** (the “**Revised Proposed Order**”), which reflects certain comments received from various parties.

PLEASE TAKE FURTHER NOTICE that, a redline of the Revised Proposed Order marked against the Proposed Order is attached hereto as **Exhibit B**.

PLEASE TAKE FURTHER NOTICE that, a hearing (the “**Hearing**”) on the Motion is scheduled for **July 31, 2024 at 1:00 p.m. (Central Time)**. The Debtors reserve all rights to alter, amend, update, or modify the Revised Proposed Order at or prior to the Hearing.

Dated: July 31, 2024
Houston, Texas

/s/ Clifford W. Carlson
WEIL, GOTSHAL & MANGES LLP
Gabriel A. Morgan (24125891)
Clifford W. Carlson (24090024)
Stephanie N. Morrison (24126930)
700 Louisiana Street, Suite 3700
Houston, Texas 77002
Telephone: (713) 546-5000
Facsimile: (713) 224-9511
Email: Gabriel.Morgan@weil.com
Clifford.Carlson@weil.com
Stephanie.Morrison@weil.com

-and-

WEIL, GOTSHAL & MANGES LLP
Ray C. Schrock (admitted *pro hac vice*)
Candace M. Arthur (admitted *pro hac vice*)
David J. Cohen (admitted *pro hac vice*)
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000
Facsimile: (212) 310-8007
Email: Ray.Schrock@weil.com
Candace.Arthur@weil.com
DavidJ.Cohen@weil.com

*Attorneys for Debtors
and Debtors in Possession*

Certificate of Service

I hereby certify that on July 31, 2024, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Clifford W. Carlson
Clifford W. Carlson